

### **REMARKS**

By way of the present response, claims 1-6 have been amended to correct minor informalities and to further define the claimed invention. Accordingly, claims 1-100 are currently pending. In view of the remarks advanced below, Applicant respectfully requests reconsideration and withdrawal of the rejections of claims.

Applicant respectfully asserts that support for the amendments to independent claims 1-6 may be found at least in FIGs. 1C-1E. Accordingly, Applicant respectfully asserts that no new matter is introduced by the present Amendment.

On page 2 of the Office Action, claims 1-100 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kurimoto (US 5,405,787) or Kudo (US 6,420,261) in view of Applicant's Disclosure, and further stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's Disclosure in view of Kikuchi et al. (JP 61-171151), Hirabayashi (JP 04-196133) or Iwabuchi et al. (JP 2006-040940). Applicant respectfully traverses these rejections for at least the following reasons.

Independent claims 1-6, as amended, each recite a method for manufacturing a semiconductor device including, in part, "forming a first insulating film by *selectively* discharging a composition including an insulator," (emphasis added). As disclosed at paragraph [0038] of Applicant's published application (US 2007-0042597), by selectively discharging the composition, the usage efficiency of a material (the composition) can be enhanced since an insulating film can be selectively formed in a necessary portion over a substrate.

In direct contrast to Applicant's claimed invention, none of Kurimoto, Kudo, Kikuchi et al., Hirabayashi, Iwabuchi et al., and/or Applicant's Disclosure, whether taken singly or combined, teach or suggest a method for manufacturing a semiconductor device including "forming a first insulating film by *selectively* discharging a composition including an insulator," as recited by each of independent claims 1-6. Accordingly, Applicant respectfully asserts that none of Kurimoto, Kudo, Kikuchi et al., Hirabayashi, Iwabuchi et al., and/or Applicant's Disclosure, whether taken singly or combined, render Applicant's claimed invention *prima facie* obvious under 35 U.S.C. § 103(a). Thus, Applicant respectfully requests that the rejection of claims 1-100 under 35 U.S.C. § 103(a) in view of Kurimoto, Kudo, Kikuchi et al., Hirabayashi, Iwabuchi et al. and/or Applicant's Disclosure be withdrawn.

Independent claims 1 and 3-6, as amended, each recite “forming a second insulating film over the first insulating film,” “performing light-exposure and development on the second insulating film to form a mask pattern,” and “forming an opening by etching the first insulating film by using the mask pattern.” In direct contrast, Kurimoto merely teaches, in FIGs. 14(a) to 14(c), forming a mask pattern 11 on the second insulating film 10. Here, Kurimoto fails to teach or suggest etching an opening in the first insulating film using the second insulating film as a mask. Accordingly, Applicant respectfully asserts that the Office Action fails to recognize this deficiency of Kurimoto, or that any of the other applied prior art or Applicant’s Disclosure can remedy Kurimoto’s deficiency. Thus, at least with regard to Kurimoto, Applicant respectfully asserts that the Office Action fails to establish a *prima facie* case of obviousness.

Independent claim 2, as amended, recites a method for manufacturing a semiconductor device including, in part, “forming a second insulating film *as a mask pattern* by selectively discharging a composition over the first insulating film,” (emphasis added). In addition, each of independent claims 3-6 recite “forming a first insulating film by selectively discharging a composition *over a thin film transistor*,” (emphasis added). In further direct contrast to Applicant’s claimed invention, none of the applied prior art or Applicant’s Disclosure teach or suggest forming a second insulating film *as a mask pattern*, or forming a first insulating film by selectively discharging a composition *over a thin film transistor*, as required by independent claims 2-6. Accordingly, Applicant respectfully asserts that independent claim 2-6 are neither taught nor suggested by the applied prior art.

Independent claims 3 and 5 both recite forming at least one opening “wherein the opening reaches one of source and drain regions of the thin film transistor,” and forming a conductive layer “wherein the conductive layer is connected to the one of the source and drain regions through the opening.” In direct contrast, none of the applied prior art or Applicant’s Disclosure teach or suggest forming an opening to reach a source/drain region of a thin film transistor and/or forming a conductive layer connected to the source/drain region through the opening, as required by independent claims 3 and 5. Accordingly, Applicant respectfully asserts that independent claim 3 and 5 are neither taught nor suggested by the applied prior art.

Similarly, independent claims 4 and 6 both recite forming at least one opening “wherein the opening reaches one of source electrode and drain electrode of the thin film transistor,” and forming a conductive layer “wherein the conductive layer is connected to the

one of the source electrode and drain electrode through the opening.” In direct contrast, none of the applied prior art or Applicant’s Disclosure teach or suggest forming an opening to reach a source/drain electrode of a thin film transistor and/or forming a conductive layer connected to the source/drain electrode through the opening, as required by independent claims 4 and 6. Accordingly, Applicant respectfully asserts that independent claim 4 and 6 are neither taught nor suggested by the applied prior art.

Independent claims 5 and 6 both recite “forming a pixel electrode electrically connected to the conductive layer.” In direct contrast, none of the applied prior art or Applicant’s Disclosure teach or suggest formation of a pixel electrode that is electrically connected to the conductive layer, as required by independent claims 5 and 6. Accordingly, Applicant respectfully asserts that independent claim 5 and 6 are neither taught nor suggested by the applied prior art.

For at least the reasons set forth above, Applicant respectfully asserts that none of the applied prior art or Applicant’s Disclosure teaches or suggests the combination of features recited by at least independent claims 1-6, and hence dependent claims 7-100. Thus, Applicant respectfully requests that the rejections under 35 U.S.C. §103(a) be withdrawn.

If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone Applicant’s undersigned representative to arrange such a conference.

Respectfully submitted,

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